

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: RANBAXY GENERIC DRUG APPLICATION
ANTITRUST LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All End-Payor Actions

Master File No.
19-md-02878-NMG

**END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs United Food and Commercial Workers Health and Welfare Fund of Northeastern Pennsylvania (“UFCW”), Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana and HMO Louisiana, Inc. (“BCBSLA”) (collectively, the “Plaintiffs,”), on behalf of themselves and the certified End-Payor Classes they represent (the “End-Payor Classes” or “EPPs”), hereby move this Court for an Order: (i) approving the Settlement; (ii) approving the Plan of Allocation; (iii) finding notice of the Settlement to the Classes comports with the requirements of due process; (iv) finding all Class Members are bound by the Settlement Agreement; (v) releasing claims as set forth in the Settlement Agreement; (vi) retaining exclusive jurisdiction over the Settlement and this Settlement Agreement, including the administration and consummation of this Settlement; and (vii) directing claims be dismissed with prejudice.

The grounds for this Motion are set forth in the accompanying Memorandum of Law in Support of End-Payor Plaintiffs’ Motion for Final Approval of the Proposed Settlement, and the Joint Declaration of Gerald Lawrence, Esq. and James R. Dugan, II, Esq. in support of (A) End-Payor Class Plaintiffs’ Unopposed Motion for Final Approval of the Proposed Class Action

Settlement; and (B) Lead Class Counsel's Motion for an Award of Attorneys' Fees, Litigation Expenses, and Service Awards, dated June 27, 2022, and all Exhibits attached thereto.

Defendants do not oppose the motion. The parties to the Settlement have agreed upon a proposed order granting the relief sought by this Motion that is attached herewith.

Dated: June 27, 2022

Respectfully submitted,

LOWEY DANNENBERG, P.C.

By: /s/Renee A. Nolan
Gerald Lawrence
Renee A. Nolan
William Olson
One Tower Bridge
100 Front Street, Suite 520
West Conshohocken, PA 19428
Tel. (215) 399-4770
glawrence@lowey.com
rnolan@lowey.com
wolson@lowey.com

Peter D. St. Phillip
44 South Broadway
Suite 1100
White Plains, New York 10601
Tel. 914-997-0500
pstphillip@lowey.com

*Counsel for Plaintiff United Food and
Commercial Workers Health and Welfare
Fund of Northeastern Pennsylvania and the
End-Payor Classes*

THE DUGAN LAW FIRM, APLC

James R. Dugan, II
David S. Scalia
TerriAnne Benedetto
One Canal Place – Suite 1000
365 Canal Street
New Orleans, LA 70130

Tel: 504-648-0180
Fax: 866-328-7670
jdugan@dugan-lawfirm.com
dscalia@dugan-lawfirm.com
tbenedetto@dugan-lawfirm.com

*Counsel for Louisiana Health Service &
Indemnity Company d/b/a Blue Cross and
Blue Shield of Louisiana, and HMO La., Inc.
and the End-Payor Classes*

and

Richard A. Sherburne, Jr.
Jessica W. Chapman
BLUE CROSS AND BLUE SHIELD OF
LOUISIANA
5525 Reitz Avenue
P.O. Box 98029
Baton Rouge, Louisiana 80809
Tel.: (225) 295-2199
Fax: (225) 297-2760

*Counsel for Louisiana Health Service &
Indemnity Company d/b/a Blue Cross and
Blue Shield of Louisiana, and HMO La., Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2022, a true copy of the foregoing document was served on all counsel of record by electronic transmission and/or electronically filing the document with the Court's CM/ECF system.

/s/Renee A. Nolan